UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 25 2016

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7677 8329
RETURN RECEIPT REQUESTED

Mr. Brent W. Walter
President
Drug and Laboratory Disposal, Inc.
331 Broad Street
Plainwell, Michigan 49080

Re: Notice of Violation
Drug and Laboratory Disposal, Inc. Plainwell, Michigan
MID 092 947 928

Dear Mr. Walter:

On April 16, 2014 representatives of the United States Environmental Protection Agency and Michigan Department of Environmental Quality (MDEQ) inspected the Drug and Laboratory Disposal, Inc. (Drug and Laboratory Disposal) facility located at 331 Broad Street in Plainwell, Michigan. The purpose of the inspection was to evaluate Drug and Laboratory Disposal's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA). The inspection focused upon those regulations related to the generation, accumulation and storage of hazardous waste. We have enclosed a copy of the inspection report including photographs taken during the inspection for your reference.

Based on information provided by Drug and Laboratory Disposal personnel, review of records, and physical observations by the inspectors, EPA has determined that the Drug and Laboratory Disposal facility violated certain requirements of the Michigan Administrative Code (MAC) and the United States Code of Federal Regulations (CFR). We find that Drug and Laboratory Disposal did not comply with the following requirement:

- Used oil generators are subject to all applicable Spill Prevention Control and Countermeasures requirements (40 CFR Part 112) in addition to the requirements of MAC R 299.9810(3) and 40 CFR Section 279.22. Containers and aboveground storage tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." See, MAC Rule 299.9810(3) [40 CFR § 279.22(c)(1)].

  During the inspection of the Maintenance Garage, the inspectors observed an oil collection device. The oil collection device was not labeled "Used Oil", see photograph number 2. At the time of the inspection, therefore, Drug and Laboratory Disposal failed

to label or mark the container in the Maintenance Garage with the words "Used Oil" as required by MAC Rule 299.9810(3) [40 CFR § 279.22(c)(1)].

Under Section 3008(a) of RCRA, 42 U.S.C. § 6928, EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Walt Francis, U. S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Nadine Deak, MDEQ – Kalamazoo District Office (deakn@michigan.gov)
John Craig, MDEQ (craigj@michigan.gov)
Lonnie Lee, MDEQ (leel@michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME:	**DRUG AND LABORATORY DISPOSAL, INC.**
FACILITY U.S. EPA ID NO.:	**MID 092 047 928**
FACILITY TYPE:	**Large Quantity Generator, Storage and Treatment Facility, and Transporter**
FACILITY ADDRESS:	331 Broad Street Plainwell, Michigan 49080
U.S. EPA REPRESENTATIVE:	Walt Francis
DATE OF INSPECTION:	April 16, 2014
SIC CODE:	4953 – Refuse Systems
NAICS CODE:	562211 – Hazardous Waste Treatment and Disposal

PREPARED BY: Walt Francis — 5/5/2014

Walt Francis
Environmental Scientist
Date

ACCEPTED BY: _____ — 5/8/14

Julie Morris, Chief
Compliance Section 2
RCRA Branch
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the Drug and Laboratory Disposal, Inc. (DLD) facility located at 331 Broad Street, Plainwell, Michigan to determine compliance with the Resource Conservation and Recovery Act (RCRA), the Michigan Administrative Code (MAC), and the Final Hazardous Waste Management Facility Operating License, with respect to DLD's management of hazardous waste, universal waste and used oil.

Participants

United States Environmental Protection Agency (U.S. EPA) Inspector -
Walt Francis, Environmental Scientist

Michigan Department of Environmental Quality (MDEQ) Inspector –
Nadine Deak, Environmental Quality Analyst

Representatives of Drug and Laboratory Disposal, Inc. -
Sharon I. Joles, Environmental Director
Robert R. Rittersdorf, Jr., Waste Processing Director
Brent W. Walter, President

Site Description/Background Information

The DLD facility in Plainwell, Michigan transports, treats, processes and stores a wide variety of chemical wastes generated by small industries, academic institutions, hospitals, and households in the Michigan, Ohio, Indiana, and Illinois area. DLD accepts four groups of hazardous wastes: Characteristic wastes (Ignitable, Corrosive, Reactive, and Toxic); F-listed wastes; K-listed wastes; and P and U listed discarded commercial chemical products. Chemical wastes received at DLD are segregated, processed, and placed in temporary storage before being shipped off-site for final disposal. Treatment processes include: lab packing; commingling; deactivation; reduction; stabilizing; and neutralization. DLD also accepts non-hazardous waste, universal waste, compressed gas cylinders, drummed waste, bulk waste, lab pack waste, batteries, used oils and antifreeze, paint and related materials, medical waste, and mercury waste. In addition, DLD dissolves controlled substances (as defined by the Drug Enforcement Administration) in solvents that are sent off-site for fuel blending. DLD has a renewed Final Hazardous Waste Management Facility Operating License dated September 25, 2012. The duration of the License is ten years. The units included in the License are three container storage and treatment areas with the following maximum storage capacity: DLS-1 (2,860 gallons), DLS-2 (3,300 gallons), and DLS-3 (27,500 gallons) and two tank storage areas; DLS-3 (three 5,000 gallon tanks,15,000 gallons) and DLS-4 (three 5,000 gallon tanks,15,000 gallons). In addition, the license includes corrective action. On June 24, 2013, a fire occurred in DLS-3 and DLS-2. Since the fire, MDEQ has allowed DLD to operate hazardous waste processing and storage activities out of DLS-1 and

DLS-5. At the time of the inspection, areas DLS-2 and DLS-3 were under construction. The DLD facility has approximately 46,500 square feet of roofed area (6,000 square feet of waste processing area), with 50 employees and operates one shift. The DLD facility has been at this location since 1977. The DLD has a U.S. EPA ID number (MID092947928) and operates as a licensed treatment and storage facility, large quantity generator (LQG), and transporter of hazardous waste. At the time of the inspection, DLD facility was operating as a licensed treatment, storage, LQG, and transporter of hazardous waste, and generates hazardous waste at several satellite accumulation areas (SAAs). Based on information in the MDEQ Waste Data System (WDS), DLD received and shipped out 1,380 shipments of hazardous waste since the last MDEQ inspection on August 27, 2013. The U.S. EPA Biennial Report System (BRS) database for 2011 shows approximately 100 waste types were shipped to various disposal facilities including: Veolia Environmental Services, Sauget, Illinois (ILD098642424); Systech Environmental Corporation, Paulding, Ohio (OHD005048047); Safety-Kleen Systems, Inc., Smithfield, Kentucky (KYD053348108); Petro-Chem Processing, Inc. Detroit, Michigan (MID980615298); Michigan Disposal Waste Treatment, Belleville, Michigan (MID000724831); Heritage-WTI, Inc., East Liverpool, Ohio (OHD980613541); and Ross Environmental Services, Grafton, Ohio (OHD048415665).

Opening Conference

U.S. EPA representative Walt Francis and MDEQ representative Nadine Deak arrived at the DLD facility at approximately 8:00 a.m. Inspectors Deak and Francis introduced themselves to Ms. Sharon Joles, Environmental Director. Ms. Joles had Inspector Francis watch a safety briefing video. Ms. Joles then took the inspectors to a conference room. Ms. Joles introduced Mr. Brent Walter, President and Mr. Robert Rittersdorf, Jr., Waste Processing Director. Inspector Francis presented his credentials, and informed them of the nature, scope, and procedures of the inspection. The inspection was conducted by U.S. EPA and MDEQ personnel with U.S. EPA being the lead enforcement agency. Ms. Joles provided the inspectors with a brief overview of the Plainwell facility. Mr. Rittersdorf provided information on areas DLS-1, DLS-3, DLS-4, DLS-5, and the warehouse. Specifically, Mr. Rittersdorf told the inspectors that DLS-3 was not being used, explained the generator waste profile procedures, and operations in DLS-1, DLS-4, and DLS-5. Mr. Rittersdorf explained the Corrosive Area in DLS-5, and the Commingling Operation in the Organic Hood in DLS-5. Mr. Rittersdorf told the inspectors that a low "BTU" hazardous waste tank and high "BTU" hazardous waste tank were located in the DLS-4 area. In addition, Mr. Rittersdorf, explained mercury operations in the "warm room" DLS-1. Inspector Francis asked about a "filter press" unit included in the RCRA license. Mr. Rittersdorf told the inspectors that the filter press had been utilized in DLS-3, but is no longer used. Mr. Rittersdorf told the inspectors about two "shredder units" that were operated in DLS-2 and DLS-3, which are now operated in area DLS-5. One shredder unit is utilized for paint cans and the other unit is utilized for trash. Mr. Rittersdorf told the inspectors that lab pack sorting, recycling oil and antifreeze, repackaging, medical waste processing, reverse distribution of hospital pharmaceutical waste activities also take place in DLS-5. Mr. Walter told the inspectors that DLD also operates as a universal waste large quantity handler. In addition, Mr. Walter

explained the ground water monitoring wells, A-1 Disposal Pond, air stripping system, and remedial action plan. Ms. Joles told the inspectors that DLD performs annual RCRA Subpart BB Method 21 monitoring of piping and valves. Mr. Walter told the inspectors that the hazardous waste tanks had been recently recertified and had relief valves. DLD personnel did not make a Confidential Business Claim on the information gathered during the inspection. Mr. Walter allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began at the DLS-1 Area. Mr. Rittersdorf showed the inspectors an elementary mercury processing area. Inspector Francis observed a container labeled "D009, 1/6/2014", a container labeled "Dental Amalgams, D009, 2/24/2014", and a container labeled "Mercury Switches, 3/5/2014", and a container labeled "Safety Matches, D001", see photograph number 1. The walk-through continued to the Maintenance Garage. Mr. Rittersdorf showed the inspectors a part washer. Inspector Francis asked about used solvents from the parts washer. Mr. Rittersdorf told the inspectors that any used parts washer solvent would be placed in the "High BTU Tank". Inspector Francis observed an oil changing device in this area which was not labeled "Used Oil", see photograph number 2. Inspector Francis also observed several aerosol cans in the Maintenance Garage. Mr. Walters told Inspector Francis that aerosol cans are sent out "as is" at the present time. The walk-through continued to area DLS-5. Mr. Rittersdorf told the inspectors that all in-coming and out-going containers are stored at the present time in DLS-5. Mr. Rittersdorf showed the inspectors the hazardous waste "Loading Bay", a TeeMark Corporation paint can/pail crushing machine, an acid processing area, two shredders (trash and paint) (see photograph number 3) and the "Organics Commingling Hood". Mr. Rittersdorf explained the commingling process. Inspector Francis observed several 55-gallon containers in the hooded area including a 55-gallon hazardous waste container labeled "Lo-BTU Drum, 4/14/2014". The walk-through continued to the Open Loading Dock, Warehouse, and Hazardous Waste Loading Bay. Mr. Rittersdorf showed the inspectors several drums thawing out in the Hazardous Waste Loading Bay. The walk-through continued to area DLS-4. Mr. Rittersdorf showed Inspector Francis three 5,000 gallon hazardous waste storage tanks. The walk-through continued back to DLS-5. Mr. Rittersdorf showed Inspector Francis several totes labeled "Used Oil" and a wooden box used to accumulate used fluorescent bulbs. Inspector Francis noted the box was labeled Universal Waste, see photograph number 4. The walk-through continued to the on-site laboratory. Mr. Walter showed the inspectors the "Wet Side" laboratory and analytical laboratory. Inspector Francis observed several SAA containers (waste hexane, waste hexane and PCBs, and acid waste).

The inspection group then returned to the conference room to review records.

Records Review

The inspectors reviewed incoming and outgoing hazardous waste manifest records, waste determination records, contingency plan, daily and weekly inspection records, and personnel training records. The inspectors reviewed waste determination records from the onsite laboratory

and Trace Analytical, Muskegon, Michigan. The last off-site shipment of hazardous waste was on April 16, 2014 to Safety-Kleen Systems, Inc., Smithfield, Kentucky (KYD053348108). The last universal waste lamp shipment was on April 10, 2014 to Valley City Environmental Services, Grand Rapids, Michigan. The last shipment of electronic waste was on March 26, 2014 to Comprenew, Grand Rapids, Michigan. Used oil was picked up by Future Environmental, Inc., Comstock Park, Michigan (MIR000013821). Mr. Randy Roundhouse a "Dock Chemist received annual hazardous waste personnel training in 2012 and 2013. Mr. Danny McRae a new employee received hazardous waste personnel training on March 10, 2014. Ms. Joles provided the inspectors with a May 10, 2013 version of the Contingency Plan. Daily and weekly inspections included date, time and inspectors initials. Mr. Walter told Inspector Francis that the last ground water monitoring well sampling event was on April 10, 2014.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. DLD would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists and a copy of the photographs taken during the inspection. Inspector Francis discussed the unlabeled used oil changing device in the Maintenance Garage and the wooden box of universal waste lamps in area DLS-5. Inspector Francis provided a U.S. EPA Small Business Resources information sheet, a U.S. EPA Region 5 Pollution Prevention contact sheet, a U.S. EPA Managing Used Oil Advice for Small Businesses fact sheet, and a Michigan Technical Assistance Program information sheet.

Attachments
Inspection Checklists.
Photographs.

Department of Environmental Quality
HAZARDOUS WASTE INSPECTION

INSPECTION DATE 4/16/2014 GEN. I.D.# MID 092 947 928 WDS ID# _____

SITE SPECIFIC NAME Drug and Laboratory Disposal, Inc.

SITE LOCATION ADDRESS 331 Broad Street

CITY Plainwell ZIP: 49080 COUNTY Allegan

Reason for Inspection: X CEI ___ FCI ___ FUI ___ CSE ___ CAC ___ COMPLAINT ___ NRR ___ OTHER

WASTE CODE	PROCESS WASTE IS GENERATED FROM
Numerous	Commingling and processing.

PERSON(S) INTERVIEWED	TITLE	TELEPHONE NUMBER
Sharon Joles	Environmental Director	269-685-9824 x213
Robert Rittersdorf, Jr.	Waste Processing Director	269-685-9824 x222
Brent Walter	President	269-685-9824 x228

INSPECTOR'S NAME	AGENCY	TELEPHONE NUMBER
Nadine Deak	MICHIGAN DEPT OF ENVIRONMENT QUALITY	269-567-3592
Walt Francis	U.S. EPA, Region 5	312-353-4921

PRIMARY BUSINESS OF FACILITY: Drug and Laboratory Disposal stores and treats laboratory, household and medical waste.

APPROX./AVG. # OF EMPLOYEES: 50 DAYS/HRS OPERATION 5 Days/8 Hours

FACILITY SIZE 3.4 acres, 5,700 sq feet PHOTOS TAKEN X YES ___ NO

CHRONOLOGY OF INSPECTION & AREAS INSPECTED :

1) _____ 4) _____ 7) _____

2) _____ 5) _____ 8) _____

3) _____ 6) _____ 9) _____

SUMMARY OF FINDINGS: (add sketch of site noting Haz Waste locations **OR** _____ copy of site plan provided by site attached)

CHECK FORMS USED	GENERAL CATEGORIES OF FACILITIES
	C E S Q G
	LIW GENERATOR
	SMALL QUANTITY GENERATOR
	SMALL QUANTITY GEN TANK SYSTEM
X	GENERATOR
	GENERATOR TANK SYSTEM
X	SMALL QTY UNIVERSAL WASTE HANDLER
	LARGE QTY UNIVERSAL WASTE HANDLER
X	USED OIL ACTIVITIES
X	TRANSPORTER ___ LIW X HAZ WST
	WOOD PRESERVER

Does the facility discharge a process wastewater to the local POTW that would otherwise be a RCRA regulated waste? _____no _____ yes (If yes, send copy of this cover sheet to SWQD).

Does Is the facility subject to air emission standards for process vents managing hazardous waste with organic concentrations of at least 10 ppmw? If yes, circle the type of operation(s): DISTILLATION FRACTIONATION THIN-FILM EVAPORATION SOLVENT EXTRACTION AIR OR STREAM STRIPPING (If yes, send a copy of this cover sheet to AQD).

CHECK FORMS USED	GENERAL CATEGORIES OF FACILITIES
X	SITE SPECIFIC PERMITTED T S D F
	PERMITTED GENERAL T S D F
	INTERIM GENERAL T S D F
X	GENERATOR APPENDIX
	TANK SYSTEM
	PERMITTED SURFACE IMPOUNDMENT
	PERMITTED WASTE PILE
	PERMITTED LAND TREATMENT
	PERMITTED LANDFILL
	MISCELLANEOUS UNITS
	PERMITTED ORGANIC AIR EMISSIONS- PROCESS VENTS
	PERMITTED ORGANIC AIR EMISSIONS- EQUIPMENT LEAKS
	INTERIM GW MONITORING (USE WITH SUBPARTS K,L, M, & N)
	INTERIM SURFACE IMPOUNDMENT
	INTERIM WASTE PILE
	INTERIM LAND TREATMENT
	INTERIM LANDFILL
	INTERIM CHEMICAL, PHYSICAL & BIOLOGICAL TREATMENT
	INTERIM ORGANIC AIR EMISSIONS FROM PROCESS VENTS
	INTERIM ORGANIC AIR EMISSIONS FROM EQUIPMENT LEAKS

INSPECTOR'S SIGNATURE _____ ***DATE*** 4/16/2014

PERMIT SPECIFIC CHECKLIST

DRUG AND LABORATORY DISPOSAL, INC.

331 BROAD STREET, PLAINWELL, MI 49080
EPA ID# MID092947928

DATE OF INSPECTION: 4/16/2014 INSPECTOR: W. Francis

This checklist pertains to operating license effective August 10, 1999 through August 10, 2009.

PART I
STANDARD CONDITIONS

Checklist not applicable to this part.

PART II
GENERAL FACILITY CONDITIONS

Covered by generic checklist.

PART III
CONTAINER STORAGE AND TREATMENT CONDITIONS

COVERAGE OF LICENSE

1. Does facility store more than 33,770 gallons of hazardous waste on site?	[NO]
2. Does facility store hazardous waste in areas other than areas specified on Attachment 7 DLS #1 and DLS #5	~~[NO]~~ yes
3. If yes to any of the above, has facility received construction permit from Director? letter from MDEQ 7/24/13	[YES]

WASTE IDENTIFICATION & QUANTITY

4. Does facility store more than 2,970 gal. (54, 55-gal. drums) in DLS-1?	[NO]
5. Does facility store more than 3,300 gal. (60, 55-gal. drums) in DLS -2?	[NO]
6. Does facility store more than 27,500 gal. (500, 55-gal. drums) in DLS-3?	[NO]
7. Does facility accept waste that exhibits characteristic of reactivity if sample has any of the following:	
a. readily capable of detonation, explosive decomposition, or reaction at standard temp. & pressure?	[NO]
b. is a forbidden explosive or a Class A or class B explosive?	[NO]

WASTE TREATMENT CAPACITY & METHODS

8. Does facility treat more than a total volume of 1,265 gallons at a time of haz wastes identified as DLS-2 & DLS-3?	[NO]
9. Does facility treat more than a maximum of 165 gallons (3, 55-gal. drums) in the area at a time ~~in DLS-2~~ using solidification treatment method specified in Attachment 10?	[NO]
10. Does facility solidify haz wastes subject to Subpart CC under treatment hood for organics located in DLS-3? not within 3yrs	~~[YES]~~ no
11. Does facility store or treat > than 550 gallons (10, 55-gal. drums) at a time under inorganic fume hood #1 & organic fume hood #2?	[NO]
12. Does facility treat haz wastes listed in Attachment 8 in accordance w/ treatment methods in Attachment 11?	[YES]
13. Does facility treat haz waste to render it non-hazardous, less hazardous or made more suitable for shipment?	[YES]
14. Does the facility mix, combine or commingle incompatible haz waste?	[NO]
a. If so, does it do so in accordance w/ procedures in Attachment 11?	N/A
b. Does the container exceed 55 gallons?	N/A
c. Is the commingling conducted under inorganic fume hood #1 or organics fume hood #2?	N/A
15. Are containers in which reactions are occurring kept under inorganic fume hood #1 or organics fume hood #2 until reaction is complete?	[YES]
16. Is lab packing:	
a. conducted in container storage area DLS-2 or DLS-3 & performed in accordance w/ procedures in Attachment11? DLS-5	[YES]
b. conducted in accordance with DOT provisions of 49 CFR Parts 171-178?	[YES]
c. conducted such that incompatible wastes are not placed in same outside container?	[YES]
17. Does facility adhere to lab packing guidelines established by receiving facility specified in Attachment 11?	[YES]
18. If guidelines revised by receiving treatment/disposal facility, did facility submit modifications to Chief of WHMD prior to implementation?	N/A
19. Does facility comply with generator requirements of Part 3 of Part 111 rules for commingled wastes shipped off-site?	[YES]

CONDITION OF CONTAINERS

20. If container of haz wastes is not in good condition or if leaking, did facility transfer haz waste to container that is in good condition?	[YES]

COMPATIBILITY W/ CONTAINERS

21. Is hazardous waste placed in containers that are compatible with waste?	[YES]

MANAGEMENT OF CONTAINERS

22. Does the facility:	
a. keep all haz waste containers stored closed except when adding or removing waste	[YES]
b. open, handle and store containers in a manner to prevent ruptures or leaks?	[YES]
c. ensure that each container in storage area is marked with words "hazardous waste", haz waste # & date it was accepted for storage and that the labels are clearly visible?	[YES]
d. stack 55-gallon drums no higher than 2 high, and that the labels on stacked drums are clearly visible?	[YES]
23. Does the facility store any container of haz waste for more than one year prior to treatment on site or shipment off-site?	[NO]
24. If yes, to above, did facility obtain approval by Chief of WHMD based on petition that storage is solely to facilitate proper recovery, treatment or disposal?	N/A

CONTAINMENT

25. Does facility operate & maintain containment system in accordance w/ requirements of Rule 614 & specifications in Attachment 6?	[YES]

SPECIAL REQUIREMENTS FOR IGNITABLE & REACTIVE WASTES

26. Does the facility locate containers of ignitable or reactive wastes at least 15 meters from property line?	[YES]
27. Does facility prevent ignition or reaction of ignitable or reactive wastes by following procedures in Attachment 9?	[YES]
28. Does facility document compliance with above procedures in operating record?	[YES]

SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES OR MATERIALS

29. Does facility follow procedures in Attachment 11 prior to placing incompatible wastes in the same containers?	[YES]
30. Does facility prevent the placement of haz waste in an unwashed container that previously held incompatible wastes?	[YES]
31. Does facility separate containers of incompatible wastes in ~~DLS-3~~ DLS-5 per procedures in Attachments 1 & 11?	[YES]
32. Does facility document compliance with above procedures and place in operating record?	[YES]

DISPOSITION OF ACCUMULATED LIQUIDS

33. Does facility remove all liquids accumulated in containment system within 24 hours of detection& manage liquids in accordance with Part 111 and the rules as specified in Attachment 7? DLS-3 + long term + DLS-5	[YES]

COMPLIANCE W/ AIR EMISSION & WASTE MANAGEMENT REQUIREMENTS FOR STORAGE CONTAINERS

34. Does facility comply with all air emission & waste management requirements for haz waste storage & treatment in containers contained in permits issued under Part 55?	[YES]

PART IV TANK SYSTEM STORAGE CONDITIONS

TANK SYSTEM STORAGE CONDITIONS

35. Does facility store more than 30,000 gallons of hazardous waste in its tank system on site? 3 tanks - 15,000 gal	[NO]
36. Does facility store hazardous waste in areas other than areas specified on Attachment 10? [illegible]	~~[NO]~~ yes
37. If yes to any of the above, has facility received construction permit from Director?	~~N/A~~ yes

WASTE IDENTIFICATION & QUANTITY

38. Does the facility store wastes other than those listed in Attachment 8 in the tank systems?	[NO]

DESIGN, CONTAINMENT & ASSESSMENT OF TANK SYSTEMS

40. Does the facility operate & maintain all tank systems in accordance w/ requirements of Part 615 & Attachment 10?	[YES]

MANAGEMENT OF TANK SYSTEMS

41. Does facility manage tanks in accordance w/ Part 615 & spill and overfill prevention procedures per Attachment 10?	[YES]
42. Are tanks managed in compliance w/ Act 207, (Fire Prevention Act)?	[YES]
43. Are tanks labeled in accordance with provisions of NFPA Standard #704?	[YES]
44. Are tanks containing LDR waste labeled w/ desc. of contents, quantity & accumulation date or is information entered into operating record?	[YES]
45. Does the facility store haz waste for more than one year in tanks prior to treatment on site or shipment off-site?	[NO]
46. If yes to above, did facility obtain approval of ERMD Chief based on petition that storage is solely to facilitate proper recovery, treatment or disposal?	N/A

SPECIAL REQUIREMENTS FOR IGNITABLE WASTES IN TANKS	
47. Are precautions described in Attachment 11 followed prior to storing ignitable wastes in tanks?	[YES]
48. Is compliance with above documented in facility's operating log?	[YES]
49. Are protective distances maintained between tank systems and public way streets?	N/A

PROHIBITION ON STORING REACTIVE WASTES OR MATERIALS	
50. Are reactive wastes stored in tank systems?	[NO]

SPECIAL REQUIREMENTS FOR STORAGE OF INCOMPATIBLE WASTES OR MATERIALS	
51. Are incompatible wastes placed in same tank system or placed in tank system that has not been decontaminated after holding an incompatible waste?	[NO]

DISPOSITION OF ACCUMULATED LIQUIDS	
52. Does facility remove spilled or leaked waste & accumulated precipitation from tank system within 24 hours of detection management in accordance with Part 111 and Attachment 7?	[YES]

COMPLIANCE W/ AIR EMISSION & WASTE MANAGEMENT REQUIREMENTS FOR STORAGE TANK SYSTEM	
53. Does facility comply with all air emission & waste management rqmnts. for haz waste tanks contained in permits issued under Part 55?	[YES]

PART V
SUBPART X UNIT CONDITIONS

CONTAINER SHREDDERS	
54. Are container shredders operated/maintained in accordance with Attachment 12?	[YES]
55. Does facility treat more than 36, 55-gallon drums per day or 1, 980 gallons in a shredder?	[NO]
56. Does facility decontaminate shredders between processing haz & non-haz. waste per procedures in Attachment 12?	[YES]
57. Is shredder made of or lined w/ materials that are compatible w/ haz waste to be treated?	[YES]
58. Is container receiving the shredded waste in compliance w/ Part 614 & 40 CFR 264, Part I?	[YES]
59. Does facility take precautions to prevent accidental ignition or reaction of waste during processing?	[YES]
60. Does facility place haz waste in unwashed shredder that previously held an incompatible waste?	[NO]

FILTER PRESS	
61. Does facility operate & maintain the filter press in accordance with requirements of 40 CFR Part 264, Subpart X?	[YES]
62. Are wastes subject to Subpart CC, treated in the filter press only if it is positioned under the treatment hoods in DLS-3?	[YES]

DISPOSITION OF ACCUMULATED WASTE	
63. Is spilled or leaked waste removed from containment system w/in 24 hours of detection & managed per Part 111?	[YES]

COMPLIANCE W/ AIR EMISSION REQUIREMENTS FOR CONTAINER SHREDDERS & FILTER PRESS	
64. Are all air emission requirements for container shredders and filter press complied with?	[YES]

PART VI
ENVIRONMENTAL MONITORING CONDITIONS

GROUNWATER MONITORING PROGRAM	
65. Groundwater monitoring system:	
a. continuously maintained and operated?	[YES]
b. consisting of monitoring wells A-5, A-6, DL-1, DL-3, DL-4, DL-5 & DL-6 (Attachment 13):	[YES]
c. sampled in accordance with sampling plan (Attachment 13):	[YES]
d. static water elevation determined to 1/8 inch or .01 foot?	[YES]
e .at least 3 volumes of water purged prior to sampling?	[YES]
f. water removed from well either treated on-site or in groundwater collection system associated with A-1 disposal?	[YES]
g. all wells have protective barriers, clearly labeled, securely capped and locked when not in use?	[YES]
h. prior to replacement or repair, division approval obtained?	[YES]
66. Are all wells sampled quarterly for listed parameters?	[YES]
67. Are sampling and analysis procedures specified in Attachment 13 used?	[YES]

68. Is annual groundwater report submitted to division chief no later than March 1 for previous calendar year?	[YES]
69. Are background groundwater quality values at all monitoring wells established on first 3 years of sampling?	[YES]
69. Are mean background values, variance, standard deviations, coefficient or variation submitted?	[YES]
70. Was data evaluated for significant changes compared to background after each sampling:	
a. if coefficient of variation is greater than 1.5 by use of sign test in Attachment 6?	[YES]
b. if coefficient of variation is less than 0.5, using students' T test at 95% confidence level?	[YES]
c. if coefficient of variation is between 0.5 and 1.5 determining if difference exceeds three standard deviations?	[YES]
d. is ½ of detection level used in calculations where value is below detection levels?	[YES]
71. Are quarterly sampling data and evaluations submitted to division chief as per license?	[YES]
72. W/in 60 days of sampling of down gradient wells, is determination made if a statistically significant increase or change in pH has occurred compared to background values for each parameter in Table 1 of Attachment 13?	[YES]
73. If increase is detected, was Tech. Support Unit notified by phone w/in 1 working day & re-sampling scheduled?	N/A
74. If statistically significant increase (or change in pH) occurred, did facility	N/A
a. notify Director w/in 1 working day by calling the division chief or appropriate district supervisor?	N/A
b. provide follow up notification to division chief in writing w/in 7 calendar days of phone call including what parameters & in what wells?	N/A
c. sample groundwater w/in 75 feet of affected well for primary & secondary parameters & determine concentration of all constituents identified in 40 CFR Part 261, Appendix IX?	N/A
d. immediately take steps to determine the cause of contamination & eliminate source of discharge?	N/A
e. w/in 90 days of determination, submit to division chief, an application for license modification to establish compliance monitoring & corrective action plan which includes	N/A
i. identification of concentration of all Appendix IX constituents?	N/A
ii. proposed changes to GW monitoring system at facility necessary to meet requirements of Rule 612?	N/A
iii. proposed changes to monitoring frequency, sampling & analysis procedures or methods per Rule 612?	N/A
f. w/in 180 days, submit to division chief detailed description of corrective actions including implementation schedule?	N/A
g. during period prior to license modification, provide division chief (or designee) w/ weekly telephone updates & written reports every 2 weeks re... progress in determining cause of contamination, to include results of all samples?	N/A
75. If div. chief determined that there was significant increase in constituents in GW, did facility cease waste receipt, storage & treatment?	N/A
76. W/in 60 days of sampling down-gradient monitoring wells, did facility determine if concentrations are higher than those found in nearest up-gradient well?	N/A
77. If statistically significant increase has occurred for any secondary parameter, did facility:	NO
a. notify director, w/in 1 working day, by calling division chief or appropriate district supervisor?	N/A
b. resample for both primary and secondary parameters in affected wells of not less than 4 samples?	N/A
c. re-determine whether or not a statistically significant increase in either primary or secondary parameters has occurred & w/in 1 working day notify division chief	N/A
d. if significant, immediately take steps to determine & eliminate cause of contamination and submit report w/in 60 days?	N/A
78. Submit results of sampling w/in 60 days of sampling to division chief?	[YES]

AMBIENT AIR MONITORING PROGRAM

79. If necessary, conduct ambient air monitoring in accordance with Attachment 14?	N/A
80. Sampling schedule for air monitoring is every 6th day?	N/A
81. Sampling period is from midnight until midnight the following day?	N/A
82. Monitoring results reported to department as required?	N/A

COMMENTS:

Department of Environmental Quality
TSDF GENERATOR APPENDIX INSPECTION FORM

Facility's Name Drug and Laboratory Disposal, Inc. Part 3 Rules

Date 4/16/2014 ID# MID 092 947 928 1994 PA 451

NOTE: *If the hazardous waste generated is in addition to the TSDF waste, the contingency plan &/or personnel training records for the generation areas are separate records from the TSDF; or if the import/export data is separate, then use the generator inspection form instead of this short form.*

FACILITY COMPLIANCE REQUIRED IN ALL AREAS
(NI - Not Inspected N/A - Not Applicable)

MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)		YES	NO	
1. Are copies of manifest for past three years available for review? (Rule 307(3): 40 CFR 262.40(a))	GRR	[X]	___	NI N/A
2. Do the manifest forms examined contain the following information:				
a) manifest document number? (Rule 304(2)(a): 40 CFR 262.20(a))	GMR	[X]	___	NI N/A
b) generator's name/mailing address/phone number/ID Number? (Rule 304(2)(b): 40 CFR 262.20(a))	GMR	[X]	___	NI N/A
c) the name and EPA ID number of Transporter? (Rule 304(2)(c): 40 CFR 262.20(a))	GMR	[X]	___	NI N/A
d) name/address/ID number of designed facility? (Rule 304(2)(d): 40 CFR 262.20(a)&(b))	GMR	[X]	___	NI N/A
e) the DOT description of waste(s)? (Rule 304(2)(e): 40 CFR 262.20(a))	GMR	[X]	___	NI N/A
f) total quantity of waste(s)/type & number of containers loaded? (Rule 304(2)(f): 40 CFR 262.20(a))	GMR	[X]	___	NI N/A
g) hazardous waste number describing the wastes? (Rule 304(2)(g)))	GMR	[X]	___	NI N/A
h) certification as required? (Rule 304(2)(h): 40 CFR 262.20(a))	GMR	[X]	___	NI N/A
i) waste minimization program/certification? (Rule 304(2)(i): 40 CFR 262.20(a))	GMR	[ ]	___	NI N/A
j) signatures as required? (Rule 304(4)(a)&(b): 40 CFR 262.23(a)(1)&(2))	GMR	[X]	___	NI N/A
3. Reportable exceptions: (Rule 308(3): 40 CFR 262.42(a) & (b))				
a) for manifests examined (except for shipments /in last 35 days), enter the number of manifests which the generator has NOT received signed copy from designated facility /in 35 days of date of shipment for LQG. (40CFR 262.42(a)(1))	GRR	N/A		
b) for manifests indicated, enter number which the generator has submitted to Regional Administrator & MDEQ, an exception report after 45 days for LQG or a copy of the manifest and indication of problem /in 60 days for SQG (Rule 308(3): 40 CFR 262.42(a)(2) for LQG or Rule 308(5): 40CFR 262.42(b) for SQG)	GRR	N/A		

OR

4. Does facility manifest hazardous waste off-site: (Rule 304(5)(a)&(b): 40 CFR 262.20(e))	GRR	[ ]	___	NI N/A
a) Is waste reclaimed under contractual agreement & reclaimed material is returned?	GRR	[ ]	___	NI N/A
b) Does facility maintain copy of contractual agreement on-site for not less than 3 years?	GRR	[ ]	___	NI N/A

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)				
5. Does facility determine if waste streams are hazardous waste? (Rule 302(1): 40 CFR 262.11)	GRR	[X]	___	NI N/A
a) Is there copy of waste evaluation on-site for 3 years? (Rule 307(1): 40 CFR 262.40(c))	GRR	[X]	___	NI N/A
b) Does facility re-evaluate waste when there are changes in materials or process? (Rule 302(3))	GGR	[X]	___	NI N/A

WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7)

Note: *Rule 311(1) and 40 CFR 262.11(d) reference 40 CFR 268.*

6. Does generator determine if the waste is restricted from land disposal? (40 CFR 268.7(a) and 268.9(a))	GLB	[X]	___	NI N/A
a) for all listed wastes?	GLB	[X]	___	NI N/A
b) for all characteristic wastes?	GLB	[X]	___	NI N/A

NOTE: *If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))*

7. If restricted waste exceeds treatment standards/prohibitions does notice go w/ each shipment, when required? (40 CFR268.7(a)(1))	GLB	[X]	___	NI N/A

OR

8. If restricted waste does not exceed treatment standards/prohibitions does notice **and** certification statement go w/ each shipment, when required? (40 CFR 268.7(a)(3))	GLB	[ ]	___	NI N/A

OR

		YES	NO	
9. If waste has exemption from prohibition on type of land disposal method utilized for waste, does notice go w/ each shipment, when required? (40 CFR 268.7(a)(7))	GLB	[X]	___	NI N/A

OR

10. If facility chooses alternative treatment standard for lab pack that contains none of the waste in appendix IV, does notice **and** certification go w/ each shipment, when required? (40 CFR 268.7(a)(9))	GLB	[ ]	___	NI N/A
11. Does the notice include: (40 CFR 268.7(a)(1)(I-v) or 268.7(a)(2)(i)(A-D) or 268.7(a)(3)(i-iv)				
a) EPA hazardous waste #?	GLB	[ ]	___	NI N/A
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	GLB	[ ]	___	NI N/A
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	GLB	[ ]	___	NI N/A
d) manifest number associated with the shipment?	GLB	[ ]	___	NI N/A
e) waste analysis data, where available?	GLB	[ ]	___	NI N/A
f) waste constituents that treater will monitor, if monitoring will not include all regulated constituents, for F001 - F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for waste code under regulated constituents)	GLB	[ ]	___	NI N/A

UNLESS

g) Does generator/treater claim they are going to monitor for ALL regulated constituents in waste in lieu of generator indicating same in the notice? (40 CFR 268.7(a)(1)(ii), 268.7(a)(2)(I)(B) & 268.7(a)(3)(ii))	GLB	[ ]	___	NI N/A
h) underlying hazardous waste constituents (except vanadium and zinc), to reasonably expected to be present at generation point, above UTS standards for D001, D002 & TCLP organics? (40 CFR 268 Subpart D & 268.48)	GLB	[ ]	___	NI N/A
12. Other than notices for waste exceeding treatment standards, do notices include:				
a) certification if notice is for shipments that meet the standards? (40 CFR 268.7(a)(2)(ii))	GLB	[ ]	___	NI N/A
b) statement that the waste isn't prohibited from land disposal & date waste is subject to prohibition if notice is for shipments under prohibitions? (40 CFR 268.7(a)(3) & 268.7(a)(3)(vii))	GLB	[ ]	___	NI N/A
13. Does facility test their waste according to frequency specified in their waste analysis plan? (40 CFR 268.7(b))	GLB	[ ]	___	NI N/A
14. Are tests on waste(s) performed as follows: (40 CFR 268.7(b))				
a) for wastes w/ treatment standards as concentrations in waste extract, does facility test treatment residues or extract of residues using specified test method to meet applicable treatment standards? (40 CFR 268.7(b)(1))	GLB	[ ]	___	NI N/A
b) for wastes prohibited under §268.32 & not subject to treatment standards, does facility test treatment residues according to generator testing requirements to make sure waste meets prohibition? (40 CFR 268.7(b)(2))	GLB	[ ]	___	NI N/A
c) for wastes w/ treatment standards as concentration in waste, does facility test treatment residues (not extract) to assure residues meet applicable treatment standards (40 CFR 268.7(b)(3))	GLB	[ ]	___	NI N/A
15. Is notice sent w/ each waste shipment to the land disposal facility? (see exemption for debris) (268.7(b)(4))	GLB	[ ]	___	NI N/A
16. Is the following information included in the notice: (40 CFR 268.7(b)(4))				
a) EPA Hazardous Waste Number? (40 CFR 268.7(b)(4)(i))	GLB	[ ]	___	NI N/A
b) waste constituents that treater will monitor, if monitoring will not include all regulated constituents, for F001 - F005, F039, D001, D002, D012-D043? (40 CFR 268.7(b)(4)(ii))	GLB	[ ]	___	NI N/A
c) whether waste is non-wastewater or wastewater? (40 CFR 268.7(b)(4)(ii))	GLB	[ ]	___	NI N/A
d) subcategory of waste (such as D003 reactive cyanide), if applicable? (40 CFR 268.7(b)(4)(ii))	GLB	[ ]	___	NI N/A
e) manifest number associated with shipment? (40 CFR 268.7(b)(4)(iii))	GLB	[ ]	___	NI N/A
f) waste analysis data, where available? (40 CFR 268.7(b)(4)(iv))	GLB	[ ]	___	NI N/A
17. Treatment facility submit certification w/ each shipment of waste or treatment residue of restricted waste to land disposal facility stating waste/residue has been treated in compliance w/ standards (except for debris)? (40 CFR268.7(b)(5))	GLB	[ ]	___	NI N/A
a) For wastes w/ treatment standards expressed as concentration in waste extract, or for prohibited wastes, is specified certification signed by an authorized representative? (40 CFR 268.7(b)(5)(i))	GLB	[ ]	___	NI N/A
b) For wastes w/ treatment standards expressed as technologies is specified certification signed by an authorized representative? (40 CFR 268.7(b)(5)(ii))	GLB	[ ]	___	NI N/A
c) For wastes w/ treatment standards expressed as concentrations in waste, are treatment standards based in part/whole on alternative analytical detection limit? (40 CFR 268.7(b)(5)(iii)))	GLB	[ ]	___	NI N/A
d) For wastes D001-D003 & D012-D043 subject to treatment standards (not expressed as method of treatment) & that are reasonably expected to contain underlying hazardous constituents did treatment on-site remove hazardous characteristic prior to being sent off-site to remove the hazardous constituents? (40 CFR 268.7(b)(5)(iv))	GLB	[ ]	___	NI N/A
e) For wastes D001-D003 and D012-D043 that contain underlying hazardous constituents did facility treat waste to remove hazardous characteristic & treat hazardous constituents to UST levels? (40 CFR 268.7(b)(5)(v))	GLB	[ ]	___	NI N/A
18. If wastes or treatment residue will be further managed off-site at a new TSDF does facility comply w/ notice & certification requirements applicable to generators? (40 CFR 268.7(b)(6))	GLB	[ ]	___	NI N/A

		YES NO
19. For recyclable wastes used in a manner constituting disposal, does facility (recycler) submit certification & notice to Regional Administrator or his/her designee? (40 CFR 268.7(b)(7))	GLB	[ ] ___ NI N/A
20. Does recycling facility of waste used in manner constituting disposal keep records of name & location of each entity receiving hazardous waste-derived product? (40 CFR 268.7(b)(7))	GLB	[ ] ___ NI N/A
21. Do they have copies of notice & certifications specified in 268.8, if applicable? (40 CFR 268.7(c)(1))	GLB	[ ] ___ NI N/A
22. Does the facility:		
a) test waste or extract of waste or treatment residue to assure wastes or treatment residues are in compliance w/ applicable treatment standards? (40 CFR 268.7(c)(2))	GLB	[ ] ___ NI N/A
b) perform tests in accordance to frequency specified in facility's waste analysis plan? (40 CFR 268.7(c)(2))	GLB	[ ] ___ NI N/A
23. Do generators or treaters who first claim that hazardous debris is excluded from definition of hazardous waste do the following:		
a) submit one-time notification? (40 CFR 268.7(d)((1))	GLB	[ ] ___ NI N/A
b) update notification if debris is shipped to a different facility? (40 CFR 268.7(d)(2))	GLB	[ ] ___ NI N/A
c) update notification for debris excluded under 261.(f)(1), if a different type of debris is treated or if a different technology is used to treat? (40 CFR 268.7(d)(2))	GLB	[X] ___ NI N/A
d) for debris excluded under 261.3(f)(1), does treatment facility document & certify compliance w/ treatment standards of Table 1 §268.45 as follows: (40 CFR 268.7(d)(3))	GLB	[ ] ___ NI N/A
i) records kept of all inspections, evaluations, analysis of treated debris to determine compliance w/ treatment standards (40 CFR 268.7(d)(3)(I))	GLB	[ ] ___ NI N/A
ii) records of any data or information the treater obtained during treatment of debris that identifies key operating parameters of treatment unit? (40 CFR 268.7(d)(3)(ii))	GLB	[ ] ___ NI N/A
24. For each shipment of treated debris, required certification of compliance w/ treatment standards, signed by an authorized representative, is placed in the facility's files? (40 CFR 268.7(d)(3)(iii))	GLB	[ ] ___ NI N/A

***NOTE**: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)*
***NOTE**: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."*

25. Does generator retain on-site data used to support waste determination based on knowledge or testing results? (40 CFR 268.7(a)(5))	GLB	[ ] ___ NI N/A
26. If restricted waste is excluded from definition of a hazardous or solid waste or is exempted from Subtitle C regulation, did generator place a one-time notice stating same in the facility file? (40 CFR 268.7(a)(6))	GLB	[ ] ___ NI N/A
27. Are all notices/certifications/demonstrations/other documents produced pursuant to Part 268, on-site & retained for 5 years from date the item is required to be produced? (40 CFR 268.7(a)(7))	GLB	[ ] ___ NI N/A

***NOTE:** This requirement (40 CFR 268.7(a)(7)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.*

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (Rule 311(1): 40 CFR 268.3)

28. Generator dilute hazardous waste or treatment residue of hazardous waste to avoid prohibition or to circumvent a land disposal prohibition? (40 CFR 268.3(a))	GLB	[ ] [ ] NI N/A

TREATMENT STANDARDS (Rule 311(1): 40 CFR 268.40)

29. If wastes exceeding treatment standards are mixed, are most stringent standards selected? (40 CFR 268.40(c))	GLB	[ ] ___ NI N/A
30. Once characteristic waste is no longer hazardous is one-time notification & certification placed in generators/treater' file & sent to the state? (40 CFR 268.9(d))	GLB	[ ] ___ NI N/A
31. Is notification & certification updated if process or operation generating waste is changed &/or if subtitle D facility receiving the waste changes? (40 CFR 268.9(d))	GLB	[ ] ___ NI N/A
32. Does facility submit change notification/certification to state by 12/31 of the calendar year? (40 CFR 268.9(d))	GLB	[ ] ___ NI N/A
Does the notification include:		
a) name and address of the subtitle D facility receiving the waste? (40 CFR 268.9(d)(1)(i))	GLB	[ ] ___ NI N/A
b) description of the waste as initially generated including: (40 CFR 268.9(d)(1)(ii))		
i) EPA hazardous waste number(s)	GLB	[ ] ___ NI N/A
ii) treatability group(s)	GLB	[ ] ___ NI N/A
iii) underlying hazardous constituents in D001, D002 or D012-D043	GLB	[ ] ___ NI N/A
33. Is the certification signed by an authorized representative? (40 CFR 268.9(d)(2))	GLB	[ ] ___ NI N/A
34. Does the certification statement include the language in 268.7(b)(5)? (40 CFR 268.9(d)(2))	GLB	[ ] ___ NI N/A
35. If treatment removed characteristic but did not treat underlying hazardous constituents is certification in 268.7(b)(5)(iv) used? (40 CFR 268.9(d)(2)(i))	GLB	[ ] ___ NI N/A

COMMENTS:

Department of Environmental Quality

HAZARDOUS WASTE TRANSPORTER INSPECTION FORM

Facility Name Drug and Laboratory Disposal, Inc. Part 4 Rules

Date 4/16/2014 ID# MID 092 947 928 1994 PA 451

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

NI - Not Inspected N/A - Not Applicable)

TRANSPORTER GENERAL REQUIREMENTS Part 263, SUBPART A

APPLICABILITY		YES NO
1. Transportation requires a manifest under the requirements of Part 3? (Rule 401(1))	TGR	X ___ NI N/A
2. Transportation under the provisions of Rule 304(5), SQG-Tolling? (Rule 401(1))	TGR	Y ___ NI N/A
3. Transportation only on-site of generator or treatment, storage or disposal facility (TSDF)? (Rule 401(2))	TGR	Y ___ NI N/A

NOTE: ***If "NO" to 1 & 2, and yes to 3, this checklist does not apply.***

4. If transporter is US importer of haz. waste **OR** commingles compatible HW of different DOT shipping descriptions, does it comply with Part 3 (except Rule 307(4) & Rule 308(1)&(2) – biennial reporting) and accumulating time limits of Rule 404(1)(b)? (Rule 401(3))	TGR	[ ] ___ NI (N/A)
5. If transporter commingles HW from lab packs, does it comply with Part 5, 6 and 7 (TSDF requirements)? (Rule 401(4))	TGR	[ ] X NI (N/A)
6. If transporter of Federal HW subject to manifesting or universal wastes imported or exported to any countries listed in 40 C.F.R. 262.58(a)(1) for the purpose of recovery, does it comply with Rule 312? (Rule 401(6))	TGR	[ ] ___ NI (N/A)
7. Does the transportation involve an explosive or munitions emergency response which was conducted in accordance with (IAW) Rule 503(2)? (Rule 401(7)) *If YES, this part does not apply*	TGR	___ ___ NI (N/A)

EPA IDENTIFICATION NUMBER Rule 402)

8. Does the transporter have an EPA ID number? (Rule 402)	TGR	[X] ___ NI N/A

TRANSPORTER REQUIREMENTS (Rule 403)

9. If transporting by highway, transporter is registered & permitted in accordance with (IAW) Act 138 (Haz. Mat. Trans. Act)? (Rule 403(1))	TGR	[X] ___ NI N/A

TRANSFER FACILITY REQUIREMENTS (Rule 404) → Detroit/[illegible]

NOTE: *Transfer facility means any transportation-related facility including loading docks, parking areas, storage areas, etc., where shipments of HW are held during transportation.* → Separate from [illegible]

10. Transporter at transfer facility complies with the following		
a) Vehicles & HW managed to prevent releases to the soil, surface or groundwater, drains and sewers? (Rule 404(1)(a))	TGR	[Y] ___ NI N/A
b) Vehicles & HW managed to prevent fugitive emissions by closing, covering or otherwise sealing containers as required in 49 CFR 173.24(b) at all times unless the container is being filled, emptied of waste or being cleaned? (Rule 404(1)(a))	TGR	[Y] ___ NI N/A
11. HW stored in containers IAW 49 CFR, Part 107 & Part 172-180 for a period of 10 days or less **OR** if >10 days, comply with TSDF requirements? (Rule 404(1)(b))	TGR	[Y] ___ NI N/A
12. HW routed to the same transfer facility more than once? (Rule 404(1)(c)) (If no, skip to # 13)	TGR	___ X NI N/A
a) Was load rejected from a TSDF & returned to generator or alternate TSDF? (Rule 404(1)(c)(i)) OR	TGR	___ [ ] NI (N/A)
b) Was load undeliverable because of TSDF maintenance, overbooking or delivery after business hours? (Rule 401(1)(c)(ii)	TGR	[ ] ___ NI (N/A)

OFF-LOADING REQUIREMENTS (Rule 404)

NOTE: *Off-loading transfer requirements do not apply if there is a continuous physical link between vehicle(s) & pipelines for purposes of offloading HW or with bulk packages where there is a break in link between transport vehicles no longer than necessary to transfer packaging from one vehicle to another.*

13. Transporter off-loads HW from vehicle or conveyance of waste in accordance with Rule 503(1)(k) complies with following:		
a) Requirements of Rule 404(1) met? (Rule 404 (2)(a))	TGR	[X] ___ NI N/A
b) Notified the dept. of initial activity & any changes w/in 30 days & notification includes:	TGR	[X] ___ NI N/A
i) Transporter name & EPA identification number? (Rule 404(2)(b)(i))	TGR	[Y] ___ NI N/A
ii) Transporter mailing address? (Rule 404(2)(b)(ii))	TGR	[Y] ___ NI N/A
iii) Transporter telephone number? (Rule 404(2)(b)(iii))	TGR	[Y] ___ NI N/A
iv) Owner of the transfer facility? (Rule 404(2)(b)(iv))	TGR	[Y] ___ NI N/A
v) Location & telephone # of all transfer facilities? (Rule 404(2)(b)(v))	TGR	[Y] ___ NI N/A
vi) Description of the transfer activity performed at each location? (Rule 404(2)(b)(vi))	TGR	[Y] ___ NI N/A

		YES NO
C) Financial capability obtained as specified in Rule 711? (Rule 404(2)(c))	TGR	[X] ___ NI N/A
d) Rqrmnts. of 49 CFR Parts 130 & 172-180, & 40 CFR 263.31 (uses & management of containers) met?(Rule 404(2)(d))	TGR	[X] ___ NI N/A
e) Secondary containment sufficient to prevent HW migrating to soil, groundwater or surface water? (Rule 404(2)(e))	TGR	[X] ___ NI N/A
f) Requirements of 49 CFR 172.602, 172.702, 172.704, & 177.148 & 29 CFR Part 1910, subpart L & 1910.120(q) & 1910.132-1910.139 re.. preparedness & prevention, contingency planning & emergency procedure & trng. met? (Rule 404(2)(f))	TGR	[X] ___ NI N/A
g) Inventory maintained? (Rule 404(2)(g)	TGR	[X] ___ NI N/A
h) Inventory contains receipt date, off-site shipment date, manifest # & results of weekly inspections of storage areas? (Rule 404(2)(g))	TGR	[X] ___ NI N/A
14. Transfer operation is located at a TSDF designated to receive HW? (Rule 404(3)) Depends Loop	TGR	___ (X) NI N/A

CONSOLIDATION and COMMINGLING (Rule 405)

15. If transporter consolidates containers of HW does original manifest for each container accompany shipment? (Rule 405(1))	TGR	[ ] (X) NI N/A
16. Transporter commingling HW? (Rule 405(2)) (If no, skip to #22)		___ (X) NI N/A
17. If transporter commingles HW of same DOT shipping description where DOT haz. class & DOT packing group remain the same, then		
a) Complies w/ applicable provisions of 49 CFR Part 173 (requirements for shipping & packaging) met? Rule 405(2)(a))?	TGR	[ ] ___ NI N/A
b) Conducts commingling in secondarily contained area sufficient to contain release? (Rule 405(2)(b))	TGR	[ ] ___ NI N/A
c) Ensures commingled HW destined for single disposal facility? (Rule 405(2)(c))	TGR	[ ] ___ NI N/A
d) Ensures that incompatible wastes not commingled? (Rule 405(2)(d))	TGR	[ ] ___ NI N/A
e) Ensures commingled wastes do not undergo chem. or thermal changes & resultant HW retains both physical & chemical properties of individual wastes? (Rule 405(2)(e))	TGR	[ ] ___ NI N/A
f) Ensures that generator authorized commingling per Rule 304(6) & enters "com-same" in special handling instructions section of manifest? (Rule 405(2)(f))	TGR	[ ] ___ NI N/A
g) For bulk rail or water shipments, where original shipment transported by more than one vehicle ensures that :		
i) Extra copies of manifest, as provided by the generator, accompany each vehicle? (Rule 405(2)(g))	TGR	[ ] ___ NI N/A
ii) DOT approved shipping paper prepared by transporter attached to top of manifest? (Rule 405(2)(g))	TGR	[ ] ___ NI N/A
iii) Shipping paper reflects differences from original re.. quantity, count and packaging? (Rule 405(2)(g))	TGR	[ ] ___ NI N/A
18. If commingling HW resulted in changes to qty., count or packaging on generator manifests ensures that:		
a) DOT approved shipping paper prepared by transporter attached to top of manifest? (Rule 405(2)(h))	TGR	[ ] ___ NI N/A
b) Shipping paper reflects differences from original re. quantity, count and packaging? (Rule 405(2)(h))	TGR	[ ] ___ NI N/A
19. If commingled load rejected by TSDF , then:		
a) Transporter contacted all generators to designate alternative TSDF? (Rule 405(2)(i))	TGR	[ ] ___ NI N/A
b) Transporter ensured that rejected load is not returned to any single generator? (Rule 405(2)(i))	TGR	[ ] ___ NI N/A
20. Transporter commingles HW which has different DOT shipping descriptions which alter components of HW on generator manifests complied with:		
a) Requirements of Sub rule 405(2)(a-3)	TGR	[ ] ___ NI N/A
b) Notified the dept. of initial activity & any changes w/in 30 days & notification includes: (Rule 405(3)(b))	TGR	[ ] ___ NI N/A
i) Transporter named and EPA ID number? (Rule 405(3)(b)(i))	TGR	[ ] ___ NI N/A
ii) Transporter mailing address? (Rule 405(3)(b)(ii))	TGR	[ ] ___ NI N/A
iii) Transporter telephone number? (Rule 405(3)(b)(iii))	TGR	[ ] ___ NI N/A
iv) Owner of transfer facility? (Rule 405(3)(b)(iv))		[ ] ___ NI N/A
v) Location & phone number where commingling activity(if other than generator site) is performed? (Rule 405(3)(b)(v))	TGR	[ ] ___ NI N/A
vi) Description of commingling activity performed at each location? (Rule 405(3)(b)(vi))	TGR	[ ] ___ NI N/A
c) New manifest prepared as a generator, in accordance with Part 3? (Rule 405(3)(c))	TGR	[ ] ___ NI N/A
d) Transporter noted (in new manifest, under special handling instructions) "com-dif" & orig. gen. manifest number(s)? (Rule 405(3)(d))	TGR	[ ] ___ NI N/A
e) Transporter- initiated manifest & gen. manifests accompany the HW to TSDF? (Rule 405(3)(e))	TGR	[ ] ___ NI N/A
i) Transporter-initiated manifest segregated from generator manifest during shipment? (Rule 405(3)(e))	TGR	[ ] ___ NI N/A
ii) All generator and transporter manifests signed by TSDF upon receipt? (Rule 405(3)(e))	TGR	[ ] ___ NI N/A
f) Ensured that generator enters "com-dif" & new manifest doc. in "special handling instructions. & additional Info" section of manifest. (Rule 405(3)(f))	TGR	[ ] ___ NI N/A
g) Complied with Part 3 of these rules, except Rule 307(4) & 308(1) and accumulation time limits? (Rule 405(3)(h))	TGR	[ ] ___ NI N/A
21. If commingled load rejected by TSDF then:		
a) Transporter contacts all generators to designate an alternative TSDF? (Rule 405(3)(h))	TGR	[ ] ___ NI N/A

		YES NO
b) Transporter ensures that rejected load is not returned to any single generator? (Rule 405(3)(h))	TGR	[ ] NI N/A

TRANSPORTER VEHICLE REQUIREMENTS (Rule 406)

22. Copy of Act 138 credentials available upon request and carried in vehicles? (Rule 406(1))	TGR	[X] NI N/A
23. Vehicles & containers used to transport HW closed and covered? (Rule 406(2))	TGR	[X] NI N/A
24. Outside of vehicles & accessory equipment free of HW? (Rule 406(2))	TGR	[X] NI N/A
25. Vehicles cleaned & purged of vapor before transport of products, incompatible waste, or non-waste material? (Rule 406(3))	TGR	[X] NI N/A
26. Protects HW from exposure to weather, fire, phys. damage or vandals? (Rule 406(4))	TGR	[X] NI N/A

TRANSPORTER FACILITY REQUIREMENTS (Rule 407)

27. Evidence of HW escaping to air, soil, surface water, groundwater, drains or sewers? (Rule 407 (2)(a))	TGR	[X] NI N/A
28. If vehicles cleaned on site, proper procedures for wash water disposal? (Rule 407(2)(b))	TGR	[ ] NI N/A
29. Facility constructed to minimize possibility of release of HW to the soil, groundwater, or surface water? (Rule 407(2)(c))	TGR	[X] NI N/A

MANIFESTING (Rule 409)

30. Michigan manifest utilized for HW destined to a Michigan facility? (Rule 409(1))	TMR	[X] NI N/A
31. Manifest, equiv. to EPA for 8700-22, used for HW shipments not generated in MI nor destined for MI facility? (Rule 409(1))	TMR	[X] NI N/A
32. Complies with provisions of 40 CFR 263, subpart B, regarding manifest system, compliance with manifest and record-keeping? Rule 409(1))	TMR	[X] NI N/A
33. If HW NOT delivered in accordance w/ manifest & provisions of 40 CFR 263.21(a), then:		
a) Manifest revised in accordance w/ 40 CFR , part 263.21(b)? (Rule 409(2))	TMR	[ ] NI N/A
b) In the comments sect. name & phone number of generator contact for instructions printed legibly? (Rule 409(2))	TMR	[X] NI N/A
34. If manifested shipment results in a significant discrepancy as specified in R 608 & a total or partial rejected shipment, did the transporter acknowledge receipt of shipment by signing & dating original manifest before leaving designated facility? (Rule 409(3)(a))	TMR	[ ] NI N/A
35. For total rejected shipment returned to the generator:		
a) Gen. signed & dated orig. manifest acknowledging receipt of returned shipment? (Rule 409(3)(b)(i))	TMR	[ ] NI N/A
b) Transporter retained copy of original manifest? (Rule 409(3)(b)(ii))	TMR	[ ] NI N/A
36. If manifested shipment was a total rejected shipment sent to alternative facility did transporter obtain generator permission to alter original manifest to designate alternative facility? (Rule 409(3)(c))	TMR	[ ] NI N/A
37. Did transporter document (in comments section per sub rule 2) generator permission? (Rule 409(3)(c))	TMR	[ ] NI N/A
38. For partial rejected shipment returned to generator, did transporter:		
a) Have generator sign & date orig. manifest acknowledging receipt of returned shipment? (Rule 409(3)(d)(i))	TMR	[ ] NI N/A
b) Retain transporter copy of original manifest? (Rule 409(3)(d)(ii))	TMR	[ ] NI N/A
39. For rejected shipment, new manifest prepared by generator in accordance w/ Part 3 prior to transport? (Rule 409(3)(e))	TMR	[ ] NI N/A
40. Transporter records maintained for 3 years? (Rule 409(4))	TMR	[X] NI N/A

HAZARDOUS WASTE DISCHARGES &EMERGENCY RESPONSE (Rule 410)

41. Fire explosion/ other discharge of HW occurred during transportation did transporter:		
a) Take appropriate actions to protect human health & the environment? (Rule 410(1))	TWD	[X] NI N/A
b) Local authorities notified? (Rule 410(1))	TWD	[X] NI N/A
c) DEQ notified via PEAS? (Rule 410(1))	TWD	[X] NI N/A
d) Required information included as part of PEAS reporting? (Rule 410(1)(a-f))	TWD	[ ] NI N/A
42. During an emergency was transporter authorized by government official to remove waste w/out manifest or w/out transporter possessing an EPA ID number or being permitted under Act 138? (Rule 410(2))	TWD	[ ] NI N/A
43. Has transporter who has discharged haz waste complied with:		
a) Notice given to the National Response Center as required by 49 CFR 171.15? (Rule 410(3)(a))	TWD	[ ] NI N/A
b) Written report provided to Director, Office of Haz. Materials Regulations, Dept. of Trans., Wash., D.C., as required in 49 CFR 171.16? (Rule 410(3)(b))	TWD	[ ] NI N/A
c) Notice provided for a bulk water shipment as required in 33 CFR 153.203? (Rule 410(3)(c))	TWD	[ ] NI N/A
d) Appropriate clean-up completed? (Rule 410(3)(d))	TWD	[ ] NI N/A

LAND DISPOSAL RESTRICTIONS (Rule 413)

44. Transporter complied with land disposal restrictions of 40 CFR, part 268? (Rule 413(1))	TGR	[X] NI N/A

COMMENTS:

Department of Environmental Quality

UNIVERSAL WASTE LARGE QUANTITY HANDLER (LQH) INSPECTION

Facility Name Drug and Laboratory Disposal Part 2 Rules

Date 4/16/2014 I.D. # MID 092 947 528 1994 PA 451

LQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or more of all these wastes on site: ***antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.***

Yes/No responses that are outside of the parenthesis are violations.
(NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(5): 40 CFR 273.31)		YES NO
1. Does LQH dispose of universal waste? (Rule 228(5): 40 CFR 273.31(a))	273.C	[ ] [X] NI N/A
2. Does LQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(5): 40 CFR 273.31(b))	273.C	[ ] [X] NI N/A

NOTIFICATION (Rule 228(5): 40 CFR 273.32)		
3. Did LQH notify DEQ of activities using form EQP5150 and did handler receive site identification number (before exceeding 5000 kg)? (Rule 228(5): 40 CFR 273.32(a)(1))	273.C	[X] NI N/A
4. Did handler maintain the LQG designation to end of the calendar year? (Rule 228(5)(a): 40 CFR 273.32	273.C	[X] NI N/A

WASTE MANAGEMENT (Rule 228(5): 40 CFR 273.33)

ANTIFREEZE: (Rule 228(5) (h) adopts Rule 228(4(h))		QTY HANDLED:
5. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.C	[X] NI N/A
6. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.C	[X] NI N/A
7. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). **[USE TANK CHECKLIST]**	273.C	[X] NI N/A
8. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.C	[X] NI N/A
9. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.C	[X] NI N/A

BATTERIES: (Rule 228(5) adopts 40 CFR 273.33(a) requirements)		QTY HANDLED:
10. Are batteries managed in way to prevent releases? (Rule 228(5): 40 CFR 273.33(a)(1))	273.C	[X] NI N/A
11. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(5): 40 CFR 273.33(a)(1))	273.C	[ ] NI N/A
12. Does the handler do any of the following w/ batteries as long as casings of batteries are not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(5): 40 CFR 273.33(a)(2))	273.C	[X] NI N/A
13. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(5): 40 CFR 273.33(a)(3))	273.C	[ ] NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(5): 40 CFR 273.33(a)(3)(i))	273.C	[ ] NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(5): 40 CFR 273.33(a)(3)(ii))	273.C	[ ] NI N/A
14. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(5): 40 CFR 273.34(a))	273.C	[X] NI N/A

CONSUMER ELECTRONICS: (Rule 228(5) (g) adopts 228(4) (f) & (g))		QTY HANDLED:
15. Are electronics managed in a manner that prevents breakage or release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.C	[X] NI N/A
16. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.C	[X] NI N/A
17. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii)	273.C	[X] NI N/A

18. Does the handler do anything beyond any of the following with the electronics: Repair electronics for potential direct reuse (Rule 228(4)(g)(i)); Remove other universal wastes from consumer electronics (Rule 228(4)(g)(ii)); Remove modular components for direct reuse (Rule 228(4) (g) (iii))?	273.C	[ ] [X] NI N/A

ELECTRIC LAMPS: (Rule 228(5) (d) adopts 228(4) (c)) **QTY HANDLED:**

19. Are lamps crushed or broken and facility trying to manage as universal waste? **(universal waste electric lamps shall not be crushed or broken under MI rule)** (Rule 228(4)(c)(i)) ***Note: different from EPA regulation***	273.C	[X] NI N/A
20. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(5)(d))	273.C	[X] NI N/A
21. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(s)" or "USED ELECTRIC LAMP(s)". (Rule 228(5)(d)) ***Note: different from EPA regulation***	273.C	[X] NI N/A
22. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(5)(d)) ***Note: different from EPA regulation***	273.C	[X] NI N/A
23. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(5)(d)) ***Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste***	273.C	[X] NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272? (228(5)(d))	273.C	[X] NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451? (228(5)(d))	273.C	[X] NI N/A

MERCURY DEVICES: (Rule 228(5) (e) adopts 40 CFR 273.33(c)) **QTY HANDLED:**

24. Are devices managed to prevent releases? (Rule 228 (5)(e): 40 CFR 273.33(c))	273.C	[X] NI N/A
25. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (5)(e): 40 CFR 273.33(c)(1))	273.C	[X] NI N/A
26. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S) " or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)".(Rule 228 (5)(e): 40 CFR 273.34(d))	273.C	[X] NI N/A
27. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(i & ii))	273.C	[X] NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(iii & iv))	273.C	[X] NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (5)(e): 40 CFR 273.33(c)(2) (v))	273.C	[X] NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(vi))	273.C	[X] NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(vi))	273.C	[X] NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(vii))	273.C	[X] NI N/A
28. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (5)(e): 40 CFR 273.33(c)(3))	273.C	[X] NI N/A
29. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (5)(e): 40 CFR 273.33(c)(3)(i))	273.C	[X] NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (5)(e): 40 CFR 273.33(c)(3)(ii))	273.C	[X] NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (5)(e): 40 CFR 273.33(c)(3)(iii))	273.C	[X] NI N/A

PESTICIDES: Rule 228(5) (b) adopts 40 CFR 273.33(b) and 273.34) **QTY HANDLED:**

30. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(5)(b): 40 CFR 273.33(b)(1))	273.C	[X] NI N/A
31. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(5)(b): 40 CFR 273.33(b)(2))	273.C	[X] NI N/A
32. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? **[USE TANK CHECKLIST]** (Rule 228(5)(b): 40 CFR 273.33(b)(3))	273.C	[X] NI N/A
33. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(5)(b): 40 CFR 273.33(b)(4))	273.C	[X] NI N/A
34. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(5)(b): 40 CFR 273.34(b)(1 & 2) & (c)(1 & 2)) **[See 273.14(c) if 273.34(b) not possible]**	273.C	[X] NI N/A

PHARMACEUTICALS: (Rule 228(5) (f) adopts 228(4) (e)) **QTY HANDLED:** _____

35. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.C	[ ] NI N/A
36. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.C	[ ] NI N/A
37. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv)	273.C	[ ] NI N/A
38. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.C	[ ] NI N/A

ACCUMULATION TIME LIMITS (Rule 228(5): 40 CFR 273.35)

39. Is universal waste accumulated one year or less? (Rule 228(5): 40 CFR 273.35(a)) **OR** (if no go to question 40)	273.C	[ ] NI N/A
40. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal (burden on handler to demonstrate)? (Rule 228(5): 40 CFR 273.35(b))	273.C	[ ] NI N/A
41. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(5): 40 CFR 273.35(c)(1))	273.C	[ ] NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(5): 40 CFR: 273.35(c)(2))	273.C	[ ] NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(5): 40 CFR 273.35(c)(3))	273.C	[ ] NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(5): 40 CFR (273.35(c)(4))	273.C	[ ] NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(5): 40 CFR (273.35(c)(5))	273.C	[ ] NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(5): 40 CFR (273.35(c)(6))	273.C	[ ] NI N/A

EMPLOYEE TRAINING (Rule 228(5): 40 CFR 273.36)

42. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(5): 40 CFR 273.36))	273.C	[ ] NI N/A

RESPONSE TO RELEASE (Rule 228(5): 40 CFR 273.37)

43. Are releases of universal waste & other residue immediately contained? (Rule 228(5): 40 CFR 273.37(a))	273.C	[ ] NI N/A
44. Is material from release characterized? (Rule 228(5): 40 CFR 273.37(b))	273.C	[ ] NI N/A
45. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(5): 40 CFR273.37(b))	273.C	[ ] NI N/A

OFF-SITE SHIPMENTS (Rule 228(5): 40 CFR 273.38 except 273.38(b))

46. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(5): 273.38(a))	273.C	[ ] NI N/A
47. If the LQH self-transports waste, does it comply with the universal waste transporter requirements? (Rule 228(5)(c): 40 CFR 273.38(b))	273.C	[ ] NI N/A
48. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(5): 273.38(c))	273.C	[ ] NI N/A
49. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(5): 40CFR 273.38(d))	273.C	[ ] NI N/A
50. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(5): 40 CFR 273.38(e)(1))	273.C	[ ] NI N/A
b. agree to where shipment will be sent? (Rule 228(5): 40 CFR 273.38(e)(1)	273.C	[ ] NI N/A
51. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(5): 40 CFR 273.38(f)(1))	273.C	[ ] NI N/A
b. agreeing to where shipment will be sent? (Rule 228(5): 40 CFR 273.38(f)(2))	273.C	[ ] NI N/A
52. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(5)(b)):40 CFR 273.38(g))	273.C	[ ] NI N/A
53. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(5): 40 CFR 273.38(h))	273.C	[ ] NI N/A

TRACKING UNIVERSAL WASTE SHIPMENTS (Rule 228(5); 40 CFR 273.39)

54. Is there a record of each shipment when universal waste is received from another handler? (Rule 228(5) 40 CFR 273.39(a))	273.C	[ ] NI N/A
55. Does the record include:		
a. name & address of originating handler or foreign shipper? (Rule 228(5): 40 CFR 273.39(a)(1))	273.C	[ ] NI N/A
b. quantity of each type of universal waste? (Rule 228(5): 40 CFR 273.39(a)(2))	273.C	[ ] NI N/A
c. date received? (Rule 228(5): 40 CFR 273.39(a)(3))	273.C	[ ] NI N/A

56. Is there a record of each shipment of universal waste shipped to another handler? (Rule 228(5): 40 CFR 273.39(b))	273.C	[X] ___ NI N/A
57. Does the record include:		
a. the name & address of the universal waste handler, designation facility or foreign destination? (Rule 228(5): 40 CFR 273.39 (b)(1))	273.C	[X] ___ NI N/A
b. quantity of each type of universal waste? (Rule 228(5): 40 CFR 273.39(b)(2))	273.C	[X] ___ NI N/A
c. date shipped? (Rule 228(5): 40 CFR 273.39(b)(3))	273.C	[X] ___ NI N/A
58. Are records kept at least for 3 years? (Rule 228(5): 40 CFR 273.39(c)(1&2))	273.C	[X] ___ NI N/A

EXPORTS (Rule 228(5): 40 CFR 273.40)

59. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(5): 40 CFR 273.40(a))	273.C	[ ] ___ NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(5): 40 CFR 273.40(b))	273.C	[ ] ___ NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(5): 40 CFR 273.40(c))	273.C	[ ] ___ NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

60. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	___ [X] NI N/A
61. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	___ [X] NI N/A
62. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	[X] ___ NI N/A
63. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	[X] ___ NI N/A
64. Does transporter comply w/ USDOT requirements for package/labels/marking/placards/shipping papers if universal waste is also hazardous material? ***Shipping papers cannot describe universal waste as "hazardous waste, (l) or (s), n.o.s." nor have waste added to USDOT proper shipping name.*** (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	[X] ___ NI N/A
65. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	[ ] ___ NI N/A
b. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a)	273.D	[ ] ___ NI N/A
c. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	[ ] ___ NI N/A

COMMENTS:

DEQ

Department of Environmental Quality, Waste and Hazardous Materials Division

USED OIL INSPECTION FORM – GENERATORS

Facility's Name Drug and Laboratory Disposal, Inc. Part 8 Rules

Date 4/16/2014 ID# MID 092 947 928 1994 PA 451

Note: *Used oil is defined as "any oil which has been refined from crude oil, or any synthetic oil which has been used and as a result of use, is contaminated with physical or chemical impurities." R 299.9109*

APPLICABILITY (Rule 809)

NI – Not Inspected, N/A – Not Applicable		YES	NO
1. Does the facility generate used oil and any of the following materials which are subject to regulation as used oil:		X	
a) mixture of used oil and hazardous waste generated by a CESQG regulated pursuant to Rule 205? (Rule 809(1)(a))	UOA	X	
b) material that contains or is otherwise contaminated w/ used oil & is burned for energy recovery? (Rule 809(1)(b))	UOA	X	
c) used oil that is drained/removed from materials that contain or contaminated w/ used oil? (Rule 809(1)(c))	UOA	X	
d) mixture of used oil and fuel? (Rule809(1)(d))	UOA	X	
e) material which is produced from used oil & is burned for energy recovery? (Rule 80991)(e))	UOA	X	
f) used oil that is burned for energy recovery & any fuel produced from used oil by processing, blending or other treatment & exceeds the following: (Rule 809(1(f))			
i) maximum arsenic concentration of 5ppm	UOA	X	
ii) maximum cadmium concentration of 2ppm	UOA	X	
iii) maximum chromium concentration of 10ppm	UOA	X	
iv) maximum lead concentration of 100ppm	UOA	X	
v) minimum flash point of 100 degrees Fahrenheit	UOA	X	
vi) maximum total halogen concentration of 4,000ppm	UOA	X	
g) recycled and a hazardous waste solely because it exhibits a hazardous characteristic? (Rule 809(1)(g))	UOA	X	
h) used oil contains PCB's at any concentration of 50ppm or less? (May also be subject to 40 CFR Part 761) (Rule 809(2)(l))	UOA	X	
2. Does the facility generate any of the following which exempts it from regulation as used oil: (may be subject to regulation as a hazardous waste)			
a) mixture of used oil and hazardous waste except as specified in Rule 809(1)(a)? (See question 1.a.) (Rule 809(2)(a))	UOA	X	
b) used oil including metalworking oils/fluids containing chlorinated paraffin w/ > 1000 ppm total halogens which hasn't been successfully rebutted by demonstrating that it does not contain significant concentrations of halogenated hazardous constituents in 40 CFR Part 261, Appendix VIII? (Rule 809(2)(b))	UOA		X
c) metalworking oils/fluids w/ chlorinated paraffin reclaimed through a tolling agreement? (Rule 809(2)(b)(i))	UOA		X
d) used oil w/ chlorofluorocarbons from refrigeration units going for reclaim? (Rule809(2)(b)(ii))	UOA		X
e) material that contains or is otherwise contaminated w/ used oil from which the oil has been removed?(Rule 809 (2)(c))	UOA		X
f) mixture of used oil/diesel fuel that is mixed on used oil generator's site & used in their own vehicles? (Rule 809(2)(d))	UOA		X
g) used oil & material derived from used oil that are disposed of or used in a manner constituting disposal? (Rule 809(2)(e))	UOA	X	
h) used oil re-refining distillation bottoms used as feed stock to manufacture asphalt products? (Rule 809(2)(f))	UOA		X
i) wastewater, the discharge of which is subject to §402 or §307(b) of the CWA & is contained w/ de minimis quantities of used oil? (Rule 809((2)(g))	UOA		X
j) mixture of used oil/crude or natural gas liquid for insertion into a crude oil pipeline? (Rule 809(2)(h))	UOA		X
k) mixture of oil/crude or nature gas liquid w/ less than 1% used oil if being stored/transported to crude oil pipeline or petroleum refinery for insertion into process before crude distillation or catalytic cracking? (Rule 809(2)(i))	UOA		X
l) used oil for insertion into petroleum refining process before crude distillation or catalytic cracking w/out prior mixing if used oil constitutes less than 1% of crude oil feed? (Rule 809 (2)(j))	UOA		X
m) used oil, unintentionally introduced, is captured by a hydrocarbon recovery system or wastewater treatment system at a petroleum refinery & inserted into the refining process? (Rule 809(2)(l))	UOA		X
n) tank bottoms from stock tanks w/mixture of used/crude oil or nature gas liquids? (Rule 809(2)(m)	UOA		X
o) used oil produced on vessels from normal shipboard operations while on-ship? (Rule 809(2)(n))	UOA		X
p) specification used oil fuel once the facility demonstrates compliance w/ R 299.9815(3)(b),(c)&(f)? (Rule809(2)(o))	UOA		X
q) used oil containing polychlorinated biphenyls at 50 ppm or greater? (Rule 809(2)(p))	UOA		X

GENERATOR REQUIREMENTS (Rule 810)

NOTE: *Used oil generator requirements do not apply to: (1) farmers who generate, in a calendar year, an average of 25gallons per month or less from vehicles or machinery used on the farm, or (2) household do-it-yourselfer*

		YES	NO
3. Is the used oil stored in units other than containers or tanks? (Rule 810(4)	UOA	[ ]	[X] NI N/A
a) in good condition? (40 CFR 279.22(b)(1))	UOA	[X]	[ ] NI N/A
b) not leaking (no visible leaks)? (40 CFR 279.22(b)(2))	UOA	[X]	[ ] NI N/A
4. Are all containers & above ground tanks storing used oil labeled/marked "Used Oil"? (40 CFR 279.22(c)(1))	UOA	[ ]	[X] NI N/A
5. Are fill pipes used to transfer used oil into underground tanks labeled/marked "Used Oil"? (40 CFR 279.22(c)(2))	UOA	[X]	[ ] NI N/A
6. Upon detection of a release does the facility:			
a) stop the release? (40 CFR 279.22(d)(1))	UOA	[X]	[ ] NI N/A
b) contain the released used oil? (40 CFR 279.22(d)(2))	UOA	[X]	[ ] NI N/A
c) clean-up and manage the released used oil & other material? (40 CFR 279.22(d)(3))	UOA	[X]	[ ] NI N/A
d) if necessary to prevent future release, repair/replace any leaking oil containers or tanks? (40 CFR 279.22(d)(4))	UOA	[X]	[ ] NI N/A

GENERATOR REQUIREMENTS FOR ON-SITE BURNING IN SPACE HEATER
(Rule 810 refers to 40 CFR 279.23)

7. Does facility that burns used oil in oil-fired space heater(s):			
a) burn only used oil generated by the owner/operator or from household do-it-yourselfers? (40 CFR 279.23(a))	UOA	[ ]	[X] NI N/A
b) burn in heaters designed to have a maximum capacity of not more than 0.5 million BTU per hour?(40 CFR 279.23(b))	UOA	[ ]	[ ] NI N/A
c) have combustion gases vented to the ambient air? (40 CFR 279.23(c))	UOA	[ ]	[ ] NI N/A

GENERATOR REQUIREMENTS FOR OFF-SITE SHIPMENTS OF USED OIL
(Rule 810 refers to 40 CFR 279.24)

8. Does the facility use a transporter with an EPA identification number? (Rule 810 refers to 40 CFR 279.24)	UOA	[X]	[ ] NI N/A

OR

9. If the facility does not use a transporter w/ an EPA identification number, does it meet one of the following exemptions?			
a) self transportation of small amounts to approved collection centers provided that the generator transports:			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(a)(1))	UOA	[ ]	[ ] NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(a)(2))	UOA	[ ]	[ ] NI N/A
iii) to a used oil collection center that is registered, licensed, permitted or recognized by government? (40 CFR 279.24(a)(3))	UOA	[ ]	[ ] NI N/A
b) self transportation of small amounts to aggregation point owned by the generator provided that the generator transports: (40 CFR 279.24(b))			
i) the used oil in a vehicle owned by the generator or an employee of the generator? (40 CFR 279.24(b)(1))	UOA	[ ]	[ ] NI N/A
ii) no more than 55 gallons of used oil at one time? (40 CFR 279.24(b)(2))	UOA	[ ]	[ ] NI N/A
iii) the used oil to a used oil aggregation point that is owned/operated by the same generator? (40 CFR 279.24(b)(3))	UOA	[ ]	[ ] NI N/A
c) used oil is reclaimed and the processor returns the oil to the generator under tolling for use as lubricant, cutting oil, or coolant? (40 CFR 279.24(c))	UOA	[ ]	[ ] NI N/A
i) the contract indicates the type and amount of used oil and frequency? (40 CFR 279.24(c)(10))	UOA	[ ]	[ ] NI N/A
ii) the contract indicates the vehicle used to transport both ways is owned by the processor? (40 CFR 279.24(c)(2))	UOA	[ ]	[ ] NI N/A
iii) the contract indicates the oil will be returned to the generator? (40 CFR 279.24(c)(3))	UOA	[ ]	[ ] NI N/A

USED OIL DISPOSAL (Rule 816)

10. Is used oil that cannot be recycled & is being disposed of & is not a hazardous waste managed in accordance w/ applicable federal & state regulations? (Rule 816(2))	UOA	[ ]	[ ] NI N/A
11. Is the used oil used as a dust suppressant? (Rule 816(3))	UOA	[ ]	[ ] NI N/A

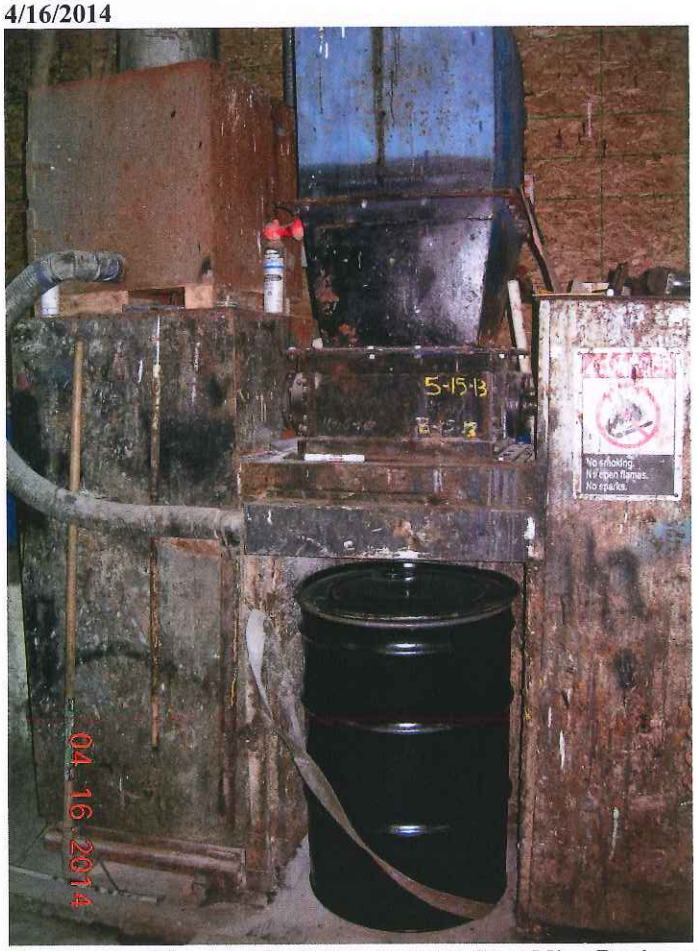
COMMENTS:-

Drug and Laboratory Disposal, Inc.
Plainwell, Michigan
4/16/2014

Photograph #1 – Area DLS-1, Salvage Drum of Hazardous Waste "Matches"

Photograph #2 – Maintenance Garage, Used Oil Collection Device

Drug and Laboratory Disposal, Inc.
Plainwell, Michigan
4/16/2014



Photograph #3 – Area DLS-5, Paint Can Shredding Device and 55-Gallon Container

Photograph #4 – Area DLS-5, Universal Waste (Used Fluorescent Lamps) Container